

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
1998 Biennial Regulatory Review,)
Streamlined Contributor Reporting)
Requirements Associated with)
Administration of Telecommunications)
Relay Services, North American)
Numbering Plan, Local Number)
Portability, and Universal Service)
Support Mechanisms)

CC Docket No. 98-171

COMMENTS

The National Exchange Carrier Association, Inc. (NECA) submits these comments in response to the Common Carrier Bureau's (CCB or Bureau) *Public Notices* in the above-captioned proceeding.¹

In its *Contributor Reporting Requirements Order*, the Federal Communications Commission (FCC or Commission) streamlined revenue reporting requirements for

¹ Common Carrier Bureau Seeks Comment on Joint Submission of Program Administrators Regarding Consolidated Data Collection Procedures and Cost Allocation Methodology, CC Docket No. 98-171, *Public Notice*, DA 99- 2334 (rel. Oct. 27, 1999) (*Public Notice*). In a subsequent Public Notice, the Bureau requested comments on a letter filed by the Universal Service Administrative Company (USAC), in which USAC seeks to be designated as the entity responsible for the data collection for these programs. Common Carrier Bureau Seeks Comment on Joint Submission of Program Administrators Regarding Consolidated Data Collection Procedures and Cost Allocation Methodology, CC Docket No. 98-171, *Public Notice*, DA 99-2545 (rel. Nov. 16, 1999) (*Supplemental Notice*) (together referred to as *Public Notices*). See Letter from D. Scott Barash, USAC, to Ms. Magalie Roman Salas, FCC (Oct. 12, 1999)(Barash Letter).

contributors to the Commission's various universal service programs.² Specifically, the Commission amended its rules to require that telecommunications carriers and other service providers file only one form, the Telecommunications Reporting Worksheet (FCC Form 499), for purposes of determining contributions to each of the four support programs.³ The Commission also decided that carriers and other parties need file only one copy of the new worksheet.⁴

The Commission directed the administrators of the Telecommunications Relay Services (TRS) fund; North American Numbering Plan Billing and Collection (NANP); Local Number Portability (LNP); and Universal Service Support Mechanisms (USSM) programs to file with the Bureau a summary of their proposed procedures for distributing data collected via the consolidated worksheet, and to describe how related costs would be equitably apportioned.⁵ Accordingly, on October 12, 1999, program administrators of the TRS fund, NANP, LNP, and USSM filed a Joint Submission in response to the Commission's directive.⁶ The administrators of these four federal programs are

² 1998 Biennial Regulatory Review – Streamlined contributor Reporting Requirements Associated with Administration of Telecommunications Relay Services, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms, CC Docket No. 98-171, *Report and Order*, FCC 99-175 (rel. July 14, 1999)(*Contributor Reporting Requirements Order*).

³ *Contributor Reporting Requirements Order* at ¶ 36.

⁴ *Id.*

⁵ *Id.* at ¶¶ 45 – 47.

⁶ Joint Submission of Program Administrators Regarding Consolidated Data Collection Procedures and Cost Allocation Methodology, CC Docket No. 98-171 (filed Oct. 12, 1999) (*Joint Submission*).

respectively, NECA; North American Billing and Collection, Inc. (NBANC); Lockheed Martin-IMS; and the Universal Service Administrative Company (USAC).

The Bureau seeks comment on whether proposals in the *Joint Submission* "will provide for the efficient collection, validation, and processing of contributor data"; whether the proposed cost allocation methodology "will lead to an equitable apportionment among the administrators"; and whether "any additional conditions should be imposed, for example, conditions to ensure the non-disclosure of confidential data filed with the proposed central data collection agent."⁷ The Bureau's *Supplemental Notice* directs persons interested in commenting on USAC's request to be designated the data collection agent (DCA) to do so in their comments on the *Joint Submission*.

In their *Joint Submission*, the Administrators state that "a central data collection agent (DCA) will be the most efficient and cost-effective vehicle for implementing the FCC's consolidated revenue data collection procedures". As the Joint Administrators point out, the DCA must assemble and "maintain an accessible database of contributor key identifier data, contributor name and address information" and must also identify new fund contributors, while tracking mergers and / or dissolutions of contributor companies. According to the Joint Administrators, the DCA must distribute FCC Form 499 on a timely basis (to assure sufficient time for carriers to prepare and submit their responses); and must respond to all industry questions about required data and the form itself. The DCA would serve as a single point of collection and data processing for data used to determine contributions for all four support programs. Also, the DCA must

⁷ *Public Notice* at 1.

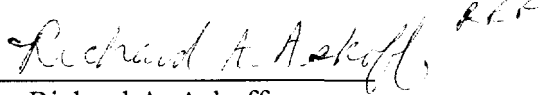
analyze reported revenue information, and perform any required follow-up on the worksheet data to resolve questions that may arise.¹⁰

If the Commission were to adopt USAC's suggestion that it be appointed DCA, other program administrators would be left with the responsibility for administering individual programs without any supervisor authority over the data collection programs.¹¹ NECA therefore, recommends that the Commission refrain from appointing a single DCA, and instead direct the program administrators to develop satisfactory procedures among themselves for selection and ongoing supervision of a single DCA. Allowing all administrators to remain involved will assure continuity of data collection procedures, avoid concerns about supervisory responsibility, and reduce potential burdens on the Commission.

Respectfully submitted,

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¹⁰ *Joint Submission* at 2-3.

¹¹ USAC asserts that it is "the program administrator with the largest number of carriers and contributions at issue" Barash Letter at 2. In fact, USAC interacts with the *fewest* number of carriers for purposes of revenue data reporting. Lockheed-Martin-IMS and NECA each process revenue information for nearly twice the number of carriers as USAC. Based on data in the most recent reporting period, for example, USAC processed data for only 2,184 carriers *versus* 4,178 for TRS, 4,100 for LNP, and 3,958 for NBANC. It is true, however, that *billings* for the programs USAC administers are larger than billings for other programs.

CERTIFICATE OF SERVICE

I hereby certify that copy of the Comments was served this 29th day of November 1999, by hand delivery or first class mail, to the persons listed below.

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